

Andrew Rozynski, Esq.
EISENBERG & BAUM, LLP
24 Union Square East, Fourth Floor
New York, NY 10003
212-353-8700 (tel.)
212-353-1708 (fax)
arozynski@eandblaw.com
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

SCOTT ALLEN TOMEI,

Plaintiff,

v.

PARKWEST MEDICAL CENTER and
COVENANT HEALTH,

Defendants.

Case No. 3:19-CV-00041

**DECLARATION OF ANDREW
ROZYNSKI**

I, Andrew Rozynski, represent Plaintiff Scott Tomei in this matter. I declare the following under penalty of perjury:

1. **Exhibit B** is a true and correct copy of Defendants Communication Assessment and Right to Interpreter for Hearing Impaired Form filled out by Plaintiff that was produced during Discovery by the Defendants.
2. **Exhibit C** is a true and correct copy of the deposition transcript of Plaintiff, Scott Tomei, dated December 16, 2019.
3. **Exhibit D** is a true and correct copy of the deposition transcript of Tala Tomei Vol I,

dated December 16, 2019.

4. **Exhibit E** is a true and correct copy of the deposition transcript of Tala Tomei Vol II, dated December 17, 2019

5. **Exhibit F** is a true and correct copy of the deposition transcript of Leigha Tomei, dated December 17, 2019.

6. **Exhibit G** is a true and correct copy of the deposition transcript of Defendant's 30(b)(6) witness, Sharon Monday, dated December 17, 2019.

7. **Exhibit H** is a true and correct copy of the deposition transcript of Michaela Whidby, dated December 17, 2019.

8. **Exhibit I** is a true and correct copy of the deposition transcript of Janelle Bagneski, dated January 17, 2019.

9. **Exhibit J** is a true and correct copy of the deposition transcript of Marie Wilson, dated December 18, 2019.

10. **Exhibit K** is a true and correct copy of Defendants relevant policies provided by the Defendant in Document Production.

11. **Exhibit L** is a true and correct copy of Defendants agreement with Stratus for Video Interpreting Services.

Dated: February 28, 2020

Respectfully submitted,

EISENBERG & BAUM, LLP

A handwritten signature in blue ink, appearing to read 'Andrew Rozynski', is written over a horizontal line.

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